REMARKS

Applicants respectfully request further examination and consideration in view of the arguments set forth fully below. Within the Office Action, Claims 1-17 and 23-31 have been rejected. Accordingly, Claims 1-17 and 23-31 are currently pending.

Rejections Under 35 U.S.C. § 103

Claims 1-15, 17 and 23-31 are rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Publication No. 2003/0064757 to Yamadera et al. (hereinafter "Yamadera") in view of U.S. Patent No. 7,188,320 to Landers (hereinafter "Landers") and U.S. Publication No. 2001/0003097 to Jeoung (hereinafter "Jeoung"). Applicants respectfully traverse this rejection.

It is recognized within the Office Action that the combination of Yamadera with Landers "does not expressly disclose 'wherein the two-dimensional navigation key is configured to allow viewing of sub-menu items associated of the submenu associated with another main menu directly from the sub-menu associated with the selected main menu item by a single access of the two-dimensional navigation key.'" However, the Examiner has interpreted the Abstract and ¶ 0008 of Jeoung as teaching this limitation. Applicants respectfully disagree with this interpretation.

The Abstract and ¶ 0008 of Jeoung teach a method of defining hot keys used to immediately initiate desired functions in a communication terminal during the *idle state* of the communication terminal. Figure 2 describes the process of defining the hot keys. Using the process taught by Jeoung, the user is able to assign/program a hot key to one or more sub-menu items (i.e., functions). The hot keys are quick keys (similar to those used for speed dialing) accessible *only* when the communication terminal is in the *idle state.* For example, the user is able to access the calendar function by pressing the UP key during the idle state of the communication terminal. [Jeoung, Abstract, ¶s 0008, 0026] The hot keys **do not** work when the communication terminal is in a *non-idle state* since the hot keys will function *as originally intended.* For example, the UP key will function as a positional key for moving the focus point up. Since the idle rest state of Jeoung is a rest state in which menus and other functions are not activated (otherwise the hot keys will not function as programmed by the user), Jeoung does not teach a two-dimensional navigation key that is configured to allow *viewing of the sub-menu items of the* **sub-menu** <u>**associated with another**</u> **main menu item** <u>***directly from* the *sub-menu***</u>

__associated with the selected main menu__ by a single access of the two-dimensional navigation key. A hot key of Jeoung does not allow the user to switch between different menus. At most, a hot key of Jeoung allows the user to view *only* one menu of functions selected by the user to be enabled by the hot key. For example, assuming that the DOWN key is assigned to multiple functions including a scheduler, a to-do-list, and a calculator, if the user presses the DOWN key during the idle state, the mobile phone displays those functions (scheduler, to-do-list, and calculator) so that the user can select one of them. [Jeoung, Abstract, ¶ 0026] As such, Jeoung does not teach that the two-dimensional navigation key is configured to allow viewing of the sub-menu items of the sub-menu associated with another main menu item directly from the sub-menu associated with the selected main menu by a single access of the two-dimensional navigation key.

Accordingly, neither Yamadera, Landers, Jeoung nor their combination teach that the two-dimensional navigation key is configured to allow viewing of the sub-menu items of the sub-menu associated with another main menu item directly from the sub-menu associated with the selected main menu by a single access of the two-dimensional navigation key. Applicants respectfully submit that to establish a prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. [MPEP 2143.03]

Unlike Yamadera, Landers, Jeoung and their combination, the display of the present invention is configured to selectively display one of a plurality of menus, including a main menu and a sub-menu. The first orientation of the two-dimensional navigation key is configured to select one of a plurality of main menu items. The plurality of sub-menu items associated with a selected main menu item is displayed on the display. The two-dimensional navigation key is configured to allow the user to view the plurality of sub-menu items associated with the selected main menu item and, with a single access, to view a plurality of sub-menu items associated with another main menu item using the first orientation. As discussed above, neither Yamadera, Landers, Jeoung nor their combination teach that the two-dimensional navigation key is configured to allow viewing of sub-menu items associated of the submenu associated with another main menu directly from the sub-menu associated with the selected main menu item by a single access of the two-dimensional navigation key.

The presently claimed invention is distinguishable from the teaching of Yamadera, Landers, Jeoung and their combination. Each of independent Claims 1, 23 and 27 includes the limitation that the two-dimensional navigation key is configured to allow viewing of sub-menu items of the sub-menu associated with another main menu item directly from the sub-menu

associated with the selected main menu item by a single access of the two-dimensional navigation key, not taught by Yamadera, Landers, Jeoung and their combination. For at least these reasons, independent Claims 1, 23 and 27 are each an allowable base claim.

Claims 2-15 and 17 are dependent upon independent Claim 1. Claims 24-26 are dependent upon independent Claim 23. Claims 28-31 are dependent upon independent Claim 27. As discussed above, independent Claims 1, 13 and 27 are each an allowable base claim. Accordingly, Claims 2-15, 17, 24-26 and 28-31 are allowable as being dependent upon an allowable base claim, and are now in condition for allowance.

Within the Office Action, Claim 16 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Yamadera, Landers and Jeoung, further in view of U.S. Patent No. 6,463,304 to Smethers (hereinafter "Smethers"). Claim 16 is dependent on independent Claim 1. As discussed above, independent Claim 1 is an allowable base claim. Accordingly, Claim 16 is allowable as being dependent upon an allowable base claim, and is now in condition for allowance.

Conclusion

For the reasons given above, Applicants respectfully submit that the claims are in a condition for allowance, and allowance at an early date would be appreciated. Should the Examiner have any questions or comments, the Examiner is encouraged to call the undersigned at (408) 530-9700 to discuss the same so that any outstanding issues can be expeditiously resolved.

Respectfully submitted,
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